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VERNON HIGAKI: Good afternoon. My name is Vernon Higaki. I am the supervisor of the energy planning for the Perry Nuclear Power Plant in Perry, Ohio. The plant is owned by FirstEnergy and is operated by its subsidiary, FirstEnergy Nuclear Operating Company. The Perry plant is located in Lake County about 35 miles east of Cleveland.

1 [I appreciate this opportunity to comment on the Department of Energy's Draft Environmental Impact Statement for siting of a spent nuclear fuel and high-level nuclear waste repository in Yucca Mountain in Nevada. As the Draft EIS demonstrates, a single, centralized repository for the placement of these materials is the safest, most economic solution to permanent disposal rather than allowing the materials to remain isolated at 77 sites around the country.]

As an emergency planning and preparedness professional and a lifetime resident of Ohio, I'm particularly aware of the need to carefully plan for the transport of spent fuel shipments through our state. The State of Ohio is an experienced participant in nuclear power plant radiological emergency planning and has demonstrated their comprehensive planning and responsiveness during many federally evaluated exercises.

The Ohio Emergency Management Agency has also demonstrated its expertise to plan and coordinate rail or truck shipments of spent fuel through Ohio.

During the 1990s, several spent fuel shipments safely passed through the State of Ohio. Ohio Emergency Management Agency professionals were the primary state agency personnel responsible for planning and coordinating these shipments so as to minimize the impact on the health and welfare of Ohio residents.

2 [Department of Energy shipments should be no different. As the Draft EIS states, Department of Energy will be obligated to comply with the NRC requirements for physical protection of spent fuel in transit. These NRC requirements are found in Title 10 of the Code of Federal Regulations Part 73. They must also comply with the U.S. Department of Transportation hazardous materials transportation requirements stated in Title 49 of the Code of Federal Regulations Part 172. These requirements include providing emergency response information to local, state and federal officials.]

3 [Advanced notifications to State of Ohio officials will be a key component of the Department of Energy's planning obligations. The NRC requires that its licensees and likewise the DOE provide 10 days of advance notification of spent fuel shipments to state governors or their designees along the proposed route. In Ohio's case, the Ohio Emergency Management Agency would receive this notification. Ohio also has a law on its books that requires 48 hour advanced notifications by shippers of such material to the Ohio Emergency Management Agency whenever shipments are scheduled to pass through the State of Ohio. The Ohio Emergency Management Agency must, in turn, notify and coordinate such shipments with other responsible state agencies. While Ohio's law seems to exempt the federal government from its scope, we would expect DOE to voluntarily comply with Ohio's reasonable pre-notification requirements in its final national transportation plan.]

3 cont'd.

We believe that the mechanisms are well in place nationally and in the State of Ohio to provide reasonable assurance to Ohio's residents that spent fuel shipments crossing this state can and will be safely accomplished.

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Thank you for this opportunity to express my views and those of FirstEnergy. We encourage the Department of Energy to finalize this Environmental Impact Statement in accordance with its published time table and keep this important process moving. Repository operation and Department of Energy acceptance of spent fuel must begin by the year 2010.